

EXHIBIT A

Joint Proposed Scheduling Order

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

INTERNATIONAL HEALTH BRANDS, LLC,
a Delaware limited liability company,

Plaintiff,

vs.

ASHLEE R. FOY, an individual;
MICHAEL L. KAUFMAN, an individual;
and KCM BRANDS, LLC, a Florida limited
liability company,

Defendants.

Case No. 9:24-cv-80679-DMM

JOINT PROPOSED SCHEDULING ORDER

THIS MATTER is set for trial for the week of March 10, 2025, but the Parties are filing a motion to reset the trial to February 1, 2026. This matter is assigned to the Complex Track. The Parties shall adhere to the following schedule:

August 28, 2024	The Parties shall furnish their initial disclosures pursuant to Fed. R. Civ. P. 26. The Parties are under a continuing obligation to furnish supplements within ten (10) days of receipt or other notice of new or revised information.
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60 days from the decision on the pending motion to dismiss (ECF No. 11).	The Parties shall file motions to amend pleadings or join Parties.
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September 15, 2025	The Plaintiff shall disclose experts, expert witness summaries and reports, as required by Federal Rule of Civil Procedure 26(a)(2).
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October 15, 2025	Defendants shall disclose experts, expert witness summaries and reports, as required by Federal Rule of Civil Procedure 26(a)(2).
October 29, 2025	The Parties shall exchange rebuttal expert witness summaries and reports, as required by Federal Rule of Civil Procedure 26(a)(2).
November 14, 2025	The Parties shall complete all discovery, including expert discovery.
October 15, 2025	The Parties shall file all dispositive pre-trial motions and memoranda of law.
December 15, 2025	The Parties shall file all motions to strike or exclude expert testimony, whether based on Federal Rule of Evidence 702 and <i>Daubert v. Merrell Dow Pharmaceuticals, Inc.</i> , 509 U.S. 579 (1993), or for any other reason. If a favorable ruling on the motion(s) would be case dispositive, however, all such motions must be filed by the dispositive motion deadline.
6 Weeks before Calendar Call	Parties shall each file one motion <i>in limine</i> . All motions <i>in limine</i> must be filed at least six (6) weeks before calendar call.
4 Weeks before Calendar Call	The Parties shall file their joint pretrial stipulation, witness lists, and exhibit lists in accordance with Local Rule 16.1(d) and (e). The Parties shall also file final proposed jury instructions or conclusions of law (for non-jury trials).

4 Weeks before
Calendar Call

The Parties shall submit their deposition designations.

Date certain for resolution of all pretrial motions by the Court.

Date certain for the date of pretrial conference.

Date certain for trial.

Additionally,

None

Any agreements or issues to be decided by the Court regarding the preservation, disclosure, and discovery of documents, electronically stored information, or things.

In the event material that is claimed privileged or protected as trial preparation material is unintentionally produced, the producing party shall notify the receiving party as soon as reasonably practical, and the receiving party shall not use the material except upon further order of the court.

Any agreements the parties reach for asserting claims of privilege or protection of trial preparation material after production.

None

Any proposed use of the Manual on Complex Litigation and any other need for rule variations, such as on deposition length or number of depositions.

Dated: August 9, 2024.

/s/ Marc J. Randazza

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Respectfully submitted,

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